

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. __

**ORDER SUSTAINING DEBTORS' SIXTIETH
(SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN OVERSTATED PROOFS OF
CLAIM (CUSTOMER CLAIMS)**

Upon the sixtieth omnibus objection (the "Objection")² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the "Debtors"), for entry of an order (this "Order") sustaining the Objection and modifying and/or reducing the Overstated Claims set forth in Schedule 1 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Overstated Claim set forth in Schedule 1 attached hereto is modified and/or reduced. The claims listed in the column titled “Modified Claims” identified in Schedule 1 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors’ right to object on any other grounds that the Debtors discover is preserved.
4. To the extent a response is filed regarding any Overstated Claim, each such Overstated Claim, and the Objection as it pertains to such Overstated Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Overstated Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested

matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

5. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

6. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

7. Nothing in the Objection or this Order, nor any actions or payments made by the Debtors pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

8. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

9. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
United States Bankruptcy Judge

SCHEDULE 1

Overstated Claims

FTX Trading Ltd. 22-11068 (JTD)
Sixtieth Omnibus Claims Objection
Schedule 1 - Modified Claims

Asserted Claims					Modified Claim	
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Debtor	Ticker Quantity
60107	Name on file	FTX Trading Ltd.	AAVE	41.6481736600000000	FTX Trading Ltd.	20.8240868300000000
			ATOM	0.0000000000000000	FTX Trading Ltd.	0.0000000000000000
			BTC	0.4150562400000000	FTX Trading Ltd.	0.2075281200000000
			ETH	2.5000346800000000	FTX Trading Ltd.	1.2500173400000000
			ETHW	0.0000000000000000	FTX Trading Ltd.	0.0000000000000000
			FTT	0.0000000000000000	FTX Trading Ltd.	0.0000000000000000
			GBP	0.0000000000000000	FTX Trading Ltd.	0.0000000000000000
			STETH	509.0593911900000000	FTX Trading Ltd.	0.0000000000000000
			USD	0.0000000000000000	FTX Trading Ltd.	0.0000000000000000
			USDT	1,018.1187823800000000	FTX Trading Ltd.	509.0593911900000000
			AAVE		FTX EU Ltd.	0.0001901700000000
			ATOM		FTX EU Ltd.	0.0018909400000000
			BTC		FTX EU Ltd.	0.0000000000000000
			ETH		FTX EU Ltd.	0.0000000000000000
			ETHW		FTX EU Ltd.	0.0009547200000000
			FTT		FTX EU Ltd.	25.4951550000000000
			GBP		FTX EU Ltd.	0.3018488800000000
			STETH		FTX EU Ltd.	1.350640897722690
			USD		FTX EU Ltd.	5,944.3720931290600000
			USDT		FTX EU Ltd.	4,887.9174975006900000

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat grossly overstate the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to reduce such customer's claim to the modified quantities and amounts. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.

46756	Name on file	FTX EU Ltd.	ALGO		FTX Trading Ltd.	24,011.8928691200000000
			AVAX	109,114.0000000000000000	FTX Trading Ltd.	0.0000000000000000
			BTC	212.0000000000000000	FTX Trading Ltd.	2.1191736400000000
			DOGE		FTX Trading Ltd.	57,284.6793504500000000
			DOT		FTX Trading Ltd.	2,835.4027603200000000
			ETH	3,148.0000000000000000	FTX Trading Ltd.	31.4780343500000000
			MATIC	2,155,603.0000000000000000	FTX Trading Ltd.	21,556.0265831600000000
			TRX		FTX Trading Ltd.	38.0000000000000000
			USD	0.2000000000000000	FTX Trading Ltd.	0.0000000000000000
			ALGO		FTX EU Ltd.	0.000000004196160
			AVAX		FTX EU Ltd.	1,091.1360128719700000
			BTC		FTX EU Ltd.	0.000000001354188
			DOGE		FTX EU Ltd.	0.000000007007224
			DOT		FTX EU Ltd.	0.000000005262964
			ETH		FTX EU Ltd.	0.000000004973980
			ETHW		FTX EU Ltd.	9.032705984638540
			EUR		FTX EU Ltd.	349.4362371233160000
			FTM		FTX EU Ltd.	34,345.9020132020000000
			MATIC		FTX EU Ltd.	0.000000006540392
			SOL		FTX EU Ltd.	581.6020584700000000
			STORJ		FTX EU Ltd.	16,511.0000000000000000
			USD		FTX EU Ltd.	0.2039656000000000

Asserted Claims					Modified Claim				
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Debtor	Ticker Quantity			
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat grossly overstate the quantities and holdings in such customer’s accounts. Accordingly, the Debtors seek to reduce such customer’s claim to the modified quantities and amounts. In addition, based on the Debtors’ review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.									
71917	Name on file	FTX Trading Ltd.	ATOM	29.9700000000000000	FTX Trading Ltd.	0.0000000000000000			
			BTC	6.0706000000000000	FTX Trading Ltd.	0.0000000000000000			
			DOGE	3,993.0000000000000000	FTX Trading Ltd.	0.0000000000000000			
			DOT	569.9750000000000000	FTX Trading Ltd.	0.0000000000000000			
			TRX	6.0000000000000000	FTX Trading Ltd.	3.0000000000000000			
			USDC	11.1734725200000000	FTX Trading Ltd.	5.5867362600000000			
			ATOM		FTX EU Ltd.	29.9650000000000000			
			BTC		FTX EU Ltd.	6.0706000012657000			
			BTC-PERP		FTX EU Ltd.	0.0000000000000005			
			BTT		FTX EU Ltd.	10,000,000.00000000000000			
			DOGE		FTX EU Ltd.	3,993.0000000000000000			
			DOT		FTX EU Ltd.	569.9750000000000000			
			FTT		FTX EU Ltd.	25.0000001500000000			
			TRX		FTX EU Ltd.	0.0007770000000000			
USDC		FTX EU Ltd.	0.0000000238792090						
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat grossly overstate the quantities and holdings in such customer’s accounts. Accordingly, the Debtors seek to reduce such customer’s claim to the modified quantities and amounts. In addition, based on the Debtors’ review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.									
44409	Name on file	FTX EU Ltd.	DOGE	923,567.2044478300000000	FTX EU Ltd.	4.6136539300000000			
			ETH	4.6008054700000000	FTX EU Ltd.	0.0000000000000000			
			ETHW	4.5995266200000000	FTX EU Ltd.	0.0000229800000000			
			EUR	36,920.3200000000000000	FTX EU Ltd.	36,920.3157496582000000			
			LTC	20.3642581000000000	FTX EU Ltd.	0.0000000000000000			
			XRP	8,106.8340452800000000	FTX EU Ltd.	0.0000000000000000			
			DOGE		FTX Trading Ltd.	923,567.2044478300000000			
			ETH		FTX Trading Ltd.	4.6008054700000000			
			ETHW		FTX Trading Ltd.	4.5995266200000000			
			EUR		FTX Trading Ltd.	0.0000000000000000			
			LTC		FTX Trading Ltd.	20.3642581000000000			
			XRP		FTX Trading Ltd.	8,106.8340452800000000			
			Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat overstate the quantities and holdings in such customer’s accounts. Accordingly, the Debtors seek to reduce such customer’s claim to the modified quantities and amounts. In addition, based on the Debtors’ review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.						
			31738	Name on file	FTX Trading Ltd.	BTC	5,458,318.0000000000000000	FTX Trading Ltd.	0.0000000000000000
CRO	14,750,812.0000000000000000	FTX Trading Ltd.				0.0000000000000000			
FTM	33,021,733.0000000000000000	FTX Trading Ltd.				0.0000000000000000			
NEAR	3,404,385.0000000000000000	FTX Trading Ltd.				0.0000000000000000			
SOL	207,165.0000000000000000	FTX Trading Ltd.				0.0000000000000000			
THE SANDBOX (SAND)	4,804,449.0000000000000000	FTX Trading Ltd.				0.0000000000000000			
USDT		FTX Trading Ltd.				204.0008761100000000			
AKRO		FTX EU Ltd.				5.0000000000000000			
ALPHA		FTX EU Ltd.				1.0000000000000000			
BAO		FTX EU Ltd.				17.0000000000000000			
BAT		FTX EU Ltd.				2.0000000000000000			
BTC		FTX EU Ltd.				0.0545831800000000			
CRO		FTX EU Ltd.				14,750.8117137700000000			
DENT		FTX EU Ltd.				1.0000000000000000			

Claim		Asserted Claims		Modified Claim		
Number	Name	Debtor	Tickers	Ticker Quantity		
			EUR	FTX EU Ltd.	0.012491184224419	
			FIDA	FTX EU Ltd.	1.000000000000000	
			FTM	FTX EU Ltd.	3,302.173261080000000	
			KIN	FTX EU Ltd.	6.000000000000000	
			NEAR	FTX EU Ltd.	340.438536920000000	
			RSR	FTX EU Ltd.	1.000000000000000	
			SAND	FTX EU Ltd.	480.444905670000000	
			SOL	FTX EU Ltd.	20.716494650000000	
			TRX	FTX EU Ltd.	6.000000000000000	
			UBXT	FTX EU Ltd.	3.000000000000000	
			USDT	FTX EU Ltd.	0.00000000107294	
			Other Activity Asserted: 3.939,41 - I have done the previous the "FTX EU withdrawal request" with the expired date 1st May 2023		0.000000000000000	
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat grossly overstate the quantities and holdings in such customer’s accounts. Accordingly, the Debtors seek to reduce such customer’s claim to the modified quantities and amounts. In addition, based on the Debtors’ review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.						
54694	Name on file	FTX Trading Ltd.	ALGO	42.065909822482900	FTX EU Ltd.	0.000000000000000
			ATOM	994.257797587996000	FTX EU Ltd.	1.700000000000000
			AVAX		FTX EU Ltd.	0.000000003525150
			BTC	140.571956216014000	FTX EU Ltd.	0.000000000000000
			DOT	435.740593723974000	FTX EU Ltd.	0.000000000000000
			ETH	273.630420054878000	FTX EU Ltd.	0.130000000000000
			FTT		FTX EU Ltd.	0.000749647554914
			HNT		FTX EU Ltd.	756.200000000000000
			MATIC	78.951241808525100	FTX EU Ltd.	0.000000000000000
			NEAR	370.358384548110000	FTX EU Ltd.	0.000000000000000
			SLND		FTX EU Ltd.	1,572.000000000000000
			SOL	2,141.035983288290000	FTX EU Ltd.	4.470000004082320
			USDT		FTX EU Ltd.	230.414496148447000
			ALGO		FTX Trading Ltd.	136.352319000000000
			ATOM		FTX Trading Ltd.	86.184370000000000
			BTC		FTX Trading Ltd.	0.008039410000000
			DOT		FTX Trading Ltd.	71.100000000000000
			ETH		FTX Trading Ltd.	0.205000000000000
			MATIC		FTX Trading Ltd.	90.654010320000000
			NEAR		FTX Trading Ltd.	165.515566370000000
			SOL		FTX Trading Ltd.	116.890000040000000
			Other Activity Asserted: Several thousand dollars - Fiat in orders (paused when FTX.eu went down)		0.000000000000000	
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat grossly overstate the quantities and holdings in such customer’s accounts. Accordingly, the Debtors seek to reduce such customer’s claim to the modified quantities and amounts.						